

Danner, Ward

From: Carmen Santos <Santos.Carmen@epamail.epa.gov>
Sent: Wednesday, March 27, 2013 1:58 PM
To: Santos, Carmen
Subject: Fw: PCBs: Aspire School Site, 66th Avenue, Oakland, California - Request for a Revised PCB Cleanup Completion Report

Carmen D. Santos
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"Think left and think right and think low and think high. Oh, the things you can think up if only you try!" Dr. Seuss

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 **Before printing this e-mail think if it is necessary. Think Green!**
----- Forwarded by Carmen Santos/R9/USEPA/US on 03/27/2013 01:57 PM -----

From: "Goloubow, Ron"
To: Carmen Santos/R9/USEPA/US@EPA,
Date: 03/16/2012 02:05 PM
Subject: RE: PCBs: Aspire School Site, 66th Avenue, Oakland, California - Request for a Revised PCB Cleanup Completion Report

Hi Carmen - just to be clear...

ARCADIS is preparing a **SEPARATE-ADDENDUM** to the report entitled "Implementation of the Toxic Substances Control Act Self-Implementing Cleanup Notification at the Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California" dated August 12, 2011 (the "Implementation Report"). The **SEPARATE-ADDENDUM** will document the remedial activities that took place at the site AFTER ARCADIS submitted a Implementation Report. The "**SEPARATE-ADDENDUM**" will document/include the following:

- **Additional Remedial Actions Conducted at the Site after the Submittal of the Implementation Report (encapsulation of soil that needed to be excavated for the redevelopment project)**
- **Revised Health Risk Screening Calculations (to include confirmation soil samples collected from the areas that needed to be excavated for the redevelopment project) and the requests from Dr. Wilson.**
- **Mitigation Measures- Revised TSCA Cap**
- **Imported Soil for Landscaped Areas (new soil data for imported soil)**

The Figures requested in the email dated 10-28-2011 will be included.

The waste disposal information (manifests and a summary of the volumes) were included in Appendix B of the Implementation Report. Since no additional soil was removed from the site thus this data – information will NOT be re-issued.

Does EPA want the laboratory lab certificates-reports on a CD or paper copies? Can you confirm that EPA wants laboratory lab certificates-reports for soil samples that failed and passed the clean up criteria?

ARCADIS will include a table that summarizes the volume of soil excavated at each area including where the material disposed.

Will this work? Is this what USEPA was thinking-anticipating?

Please let me know.

Ron Goloubow, PG | Principal Geologist | ron.goloubow@arcadis-us.com
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From: Santos.Carmen@epamail.epa.gov [<mailto:Santos.Carmen@epamail.epa.gov>]

Sent: Friday, October 28, 2011 11:28 AM

To: Goloubow, Ron

Subject: PCBs: Aspire School Site, 66th Avenue, Oakland, California - Request for a Revised PCB Cleanup Completion Report

Hello Ron:

You had sent us a document that was supposed to capture the PCB cleanup at the Aspire site in Oakland. However, after we had reviewed that document additional work including additional PCB cleanup was conducted that is not formally captured in any report. The following data gaps must be reconcile in a revised PCB Cleanup Completion Report.

1. Additional excavations conducted at the site to remove soil contaminated with PCBs above the cleanup level.
2. Consolidation at the Aspire site of certain soils contaminated with PCBs above the cleanup level,
3. All changes made to the cap, such as materials, thickness, and incorporation of landscaping areas,
4. Revised final risk calculations associated with residual PCB concentrations remaining at the site,
5. Figures depicting the areas where cleanup levels were achieved, where the cleanup levels were not achieved, and areas where soils contaminated with PCBs above the cleanup level were consolidated,
6. Figures depicting the final cap and showing construction details (e.g., materials and thickness of each layer) as well as landscape areas,
7. Figures depicting the redevelopment project in its final configuration,
8. Figures depicting survey coordinates for the location of soils beneath the cap containing PCBs above the cleanup level,
9. Waste disposal information (e.g., volumes of soil disposed of and facility to which it was sent for disposal, table summarizing Hazardous Waste Manifest and other waste transportation documentation for wastes containing PCBs at, above, and below 50 mg/kg),
10. Laboratory analytical data for PCB site characterization and cleanup verification samples, and
11. Confirmation of the source of fill used in landscape areas at the site in addition to the laboratory analysis data for such fill material.

I want to clarify in reference to the above data or information gaps that our approval of the PCB cleanup notification requires a PCB Cleanup Completion Report be submitted and the report is to contain information listed in the approval letter as well as the information in 40 CFR 761.61(a)(9). In addition, given the risk-based cleanup level established for the Aspire site, the report is to include any risk calculations associated with residual PCB concentrations remaining at the site. Based on conversations that we had with Dr. Patrick Wilson (EPA R9 Senior Toxicologist) and your toxicologist, the risk calculations may have been revised, however, these are not formally included in any report.

In light of the above, I am asking that a revised PCB Cleanup Report be submitted for our review that incorporates all the information required in EPA's approval letter, 40 CFR 761.61(a)(9), and that is responsive to the information data gaps described in this message.

Please let me know the date by which Aspire/Arcadis can submit the requested report to EPA for review.

Thank you for your courtesies and please call me if you have any questions concerning this message.

Sincerely,

Carmen

Carmen D. Santos

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